

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 21-51 (DWF/TNL)

United State of America,	)	
	)	
Plaintiff,	)	
	)	DEFENDANT’S
v.	)	PROPOSED VOIR DIRE
	)	
Edell Jackson,	)	
	)	
Defendant.	)	

Defendant Edell Jackson, through his counsel, Daniel L. Gerdts, Esq., respectfully requests leave to conduct lawyer *voir dire* of the venire panel and submits the following proposed questions for the Court’s *voir dire* of the venire in the above-captioned case:

1. What is your name and address?
2. How long have you lived at this address?
3. What other cities and states have you lived in, and for how long?
4. What is your marital status?
5. If married, separated, or living with a domestic partner, what is that person's occupation?
6. What is that person's level of education?

7. Do you have children? If so, what is each one's age, sex, and occupation, if employed?
8. If there are adults in your household other than your spouse/partner or children, what are their occupations and employers?
9. Are you currently employed outside the home? If so, what is your occupation and title?
10. Who is your employer, and what do they do there?
11. Where is your employer located?
12. How long have you worked for this employer?
13. If you are unemployed, retired, disabled, a full-time homemaker, or a student, what type of work did you do most recently, what were your job responsibilities, when were you last employed, how long did you work there, and who was your employer?
14. Does [or did] your job require you to make decisions on a frequent basis?
15. Describe your educational background, including last grade completed, name of any vocational school(s) and/or college(s) attended, and major areas of study?
16. What organizations do you belong to or in which you participate? (Please include veterans groups, service clubs, unions, volunteer groups, church/temple, neighborhood, educational, or political groups.)
17. Have you ever served on a board of directors or other governing body of a company or organization?
18. Do you belong to any group or organization that is active in any political matters?
19. Have you or anyone close to you ever been elected, appointed, or served as a

volunteer in any other city, state, or federal governmental position, committee, advisory board, or commission?

20. What are your hobbies and spare-time activities?
21. What newspapers and magazines do you read and how often?
22. What section of the newspaper do you read most frequently?
23. What type of news story are you most likely to read?
24. Do you follow crime stories from commission of the crime to arrest?
25. What kinds of books do you like to read?
26. Have you taken any courses, had any training, or been employed in any way in any of the following areas:

Federal, state, or local government

Law or the courts

Law enforcement

If "yes" to any of the above, please explain.

27. Have you ever served on a jury, including a grand jury?

If yes, when? What court? Did you reach a verdict? Was it a criminal or civil case? How did you feel about your experience(s) as a juror? Were you ever the foreperson?

28. Have you, anyone close to you, or any of your employers ever:

Been a victim of a crime?

Witnessed a crime?

Been interviewed by police about a crime?

Been accused of a crime?

Been charged with a crime?

Been convicted of a crime?

Made a charge against someone?

Been a witness in court?

Been sued?

Sued someone else?

Given an interview, statement, or deposition in any kind of lawsuit?

If yes to any of the above, please explain.

29. Have you, or has anyone close to you, ever worked in or had any contact with:

United States Attorney's Office

Any state or federal law enforcement agency

United States Courts

Any Minnesota Court

Any other court

If yes, was it you, family, or a friend? What was the nature of the work or contact?

30. Is there anything else that the judge or lawyers should know about you that could affect your ability to serve as an impartial juror on this case?

31. The Defendant and several of the potential witnesses in this case are African-Americans. Will the race or ethnicity of the Defendant or any of the witnesses affect your ability to be fair and impartial?

32. Do you believe that Black men are more likely to be guilty if accused of crimes?

33. This case involves the allegation that the Defendant was previously convicted of a felony. Would the fact of conviction for another offense, if true, affect your ability to be fair and impartial in deciding whether Defendant is guilty of the offense charged in this case?

34. Did you know any of your fellow jurors before you came here today?

35. Have you, or has anyone else you know, had any contact with any of the following people?:

[list names of parties, lawyers, case agents, and witnesses]

Dated: 17 February 2022

Respectfully submitted,

DANIEL L. GERDTS, LAWYER

/s/ Daniel L. Gerdts

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ATTORNEY FOR DEFENDANT